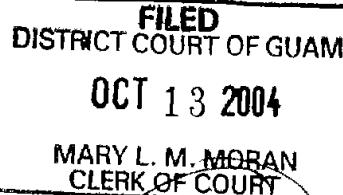


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IN THE UNITED STATES  
DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU ) CIVIL CASE NO. 03-00036  
SADHWANI, and K. SADHWANI'S )  
INC., a Guam corporation, )  
Plaintiffs, )  
vs. )  
HONGKONG AND SHANGHAI )  
BANKING CORPORATION, LTD., a )  
Foreign corporation, JOHN DOE I )  
through JOHN DOE X, )  
Defendants. )  
\_\_\_\_\_  
)

**NOTICE OF MOTION AND  
PLAINTIFFS' MOTION FOR  
SANCTIONS**

**TO: DEFENDANT HONGKONG AND SHANGHAI BANKING CORPORATION,  
LTD. AND ITS ATTORNEYS OF RECORD BRONZE & TANG AND LAW  
OFFICES OF RICHARD A. PIPES:**

PLEASE TAKE NOTICE that plaintiffs will bring on for hearing their Motion for Sanctions on or after November 3, 2004, at \_\_\_\_\_ .m. or as soon thereafter as the matter may be heard before the Honorable District Court Judge in the U.S. District Court of Guam, 4th Floor, U. S. Courthouse, 520 West Soledad Avenue, Hagåtña, Guam 96910.

Plaintiffs' motion is based on F.R.C.P. 11, 28 U.S.C. section 1927, the inherent authority of the Court, the memorandum of points and authorities in support of the motion, the declaration of

**ORIGINAL**

Anita P. Arriola and exhibits attached thereto, all of the pleadings and records filed in this action, and any oral or documentary evidence that may be adduced at the hearing thereon.

Dated this 13<sup>th</sup> day of October, 2004.

**ARRIOLA, COWAN & ARRIOLA**  
Attorneys for Plaintiffs Alan Sadhwani, et al.

By:   
**ANITA P. ARRIOLA**

**CERTIFICATE OF SERVICE**

I, ANITA P. ARRIOLA, hereby certify that on October 13, 2004, I caused to be served via hand delivery, a **NOTICE OF MOTION AND PLAINTIFFS' MOTION FOR SANCTIONS** to:

**Jacques G. Bronze, Esq.  
Bronze & Tang, P.C.  
2nd Floor, BankPacific Building  
825 S. Marine Drive  
Tamuning, Guam 96913**

Dated this 13th day of October, 2004.

  
ANITA P. ARRIOLA